"Privacy is a fundamental human right ...
Privacy underpins human dignity and other key values such as freedom of association and freedom of speech."

Source: Privacy International, Sept 2015

REALITY is a little Messy

- Privacy means different things in different countries.
- Privacy means different things to different generations.
- Privacy requires implementation of security control... controls which may subvert the goals of privacy protection.

Percentage of millenials who would be willing to give away more personal information for a better on-line shopping experience?

- 1. 56%
- 2. 23%
- 3. 7%

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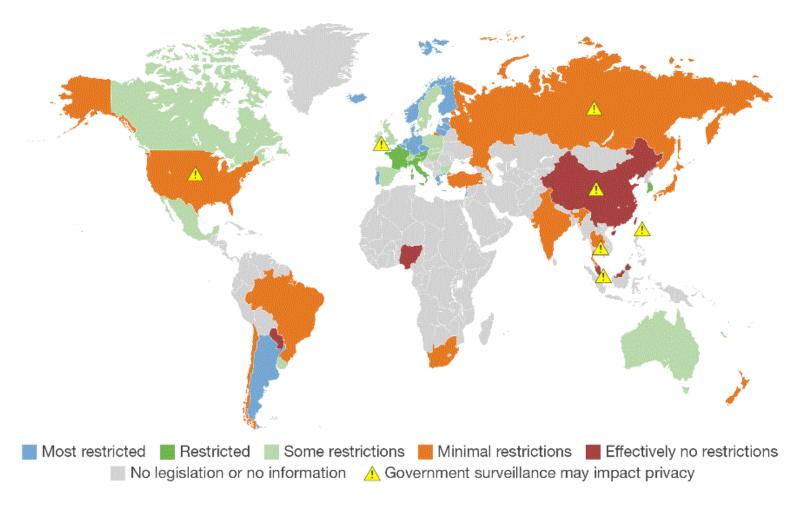
Source: Direct Marketing Association

Top 3 Drivers of Privacy Protection (aka Privacy) Regulation World-Wide

- To promote electronic commerce. Many countries, especially in Asia, Canada and the U.S., have developed laws in an effort to promote electronic commerce. These countries recognize consumers are uneasy with their personal information being sent worldwide.
- To ensure laws are consistent with Pan-European laws. Most countries in Central and Eastern Europe are adopting new laws based on the Council of Europe Convention and the European Union Data Protection Directive.
- To remedy past injustices. Many countries, especially in Central Europe, South America and Africa, are adopting laws to remedy privacy violations that occurred under previous authoritarian regimes.

Source: Privacy and Human Rights - http://gilc.org/privacy/survey/intro.html

The patchwork of privacy laws



SOURCE: Forrester's 2014 Data Privacy Heat Map

Practically (my definition)...

PRIVACY: The right of an **individual** to

- Control your own personal information,
- Not have it disclosed, used or modified by others without permission.

Privacy protection regulations require:

- Be accountable Establish ownership and accountability within the organization for confidentiality, integrity, and availability
- Identify & document purposes Identify the reasons for obtaining private information from an end user, make those reasons available to the end user
- Ensure consent Establish mechanisms for gaining consent of the end user before collecting private information
- Limit collection Limit collection of private information to only that information you need for business purposes
- Limit use, disclosure and retention Limit use, disclosure only for the purposes for which
 you have gained consent. Limit retention of information to a time period specified by
 law and/or consent
- Ensure accuracy Ensure that information collected is accurate
- Implement safeguards Implement administrative, technical, and physical controls around information in order to ensure its confidentiality, integrity, and availability
- Create openness Create a culture of openness, so that if the confidentiality, integrity or availability of the information is breached in a significant way that the end user is notified
- Provide recourse Provide the end user with documented escalation policy and process.

SECURITY is the means used to protect the confidentiality, availability and integrity of personal information through physical, technical and administrative safeguards.



COMMERCIAL BREAK: Privacy Protection is only one of 4 risk domains involving/leveraging Security

The BIG Four	Cyber War/Unrest (Emerging Focus)	Cyber Espionage (Emerging Focus)	Cyber Crime (Existing Focus)	Privacy
Basic Requirement:	 Assure the availability and integrity of critical infrastructure assets for the purpose of ensuring the public good 	Assure the confidentiality, integrity, and availability of select data sets considered "crown jewel" by the organization.	In order to mitigate the risk of money laundering, fraud the general requirement is to protect integrity, availability and authenticity of financial transactions	Assure the confidentiality, integrity, and availability of personally identifiable information in order to protect fundamental human rights
Buzzwords:	■ Cyber Warfare ■ Hacktivism	■ Cyber Espionage	Money LaunderingFraudIdentity Theft	■ Privacy ■ Identity Theft
Concern owner:	■ IT Security	CISO Legal Officer	■ Financial Crime Unit	Chief Privacy Officer

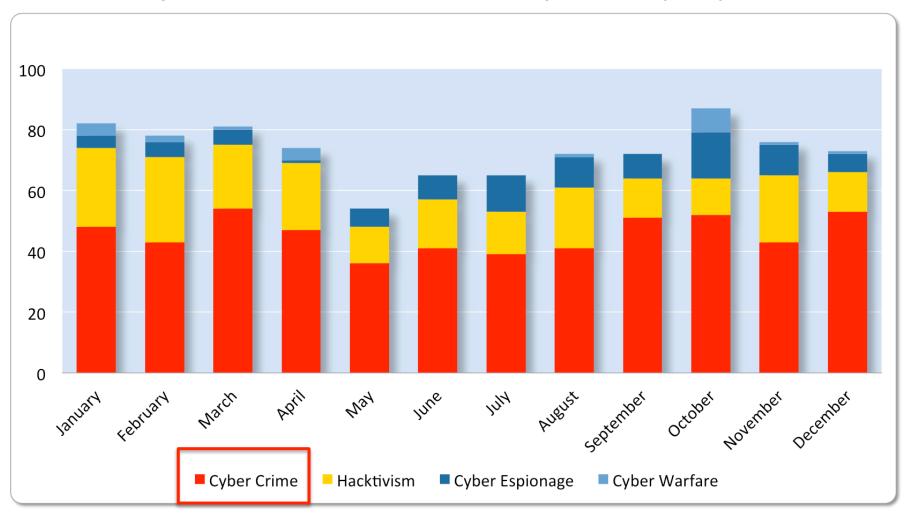


Operational Resilience

Business Competitivenes Consumer Protection

Civil Liberty

Practically, what do businesses worry about (risk)?



Source: Hackmaggedon Index 2014

Security reality – we have all been compromised

1,764,121

Represents the number of security events the average organization of 15K employees will capture weekly

of these events represent actual attacks, per week

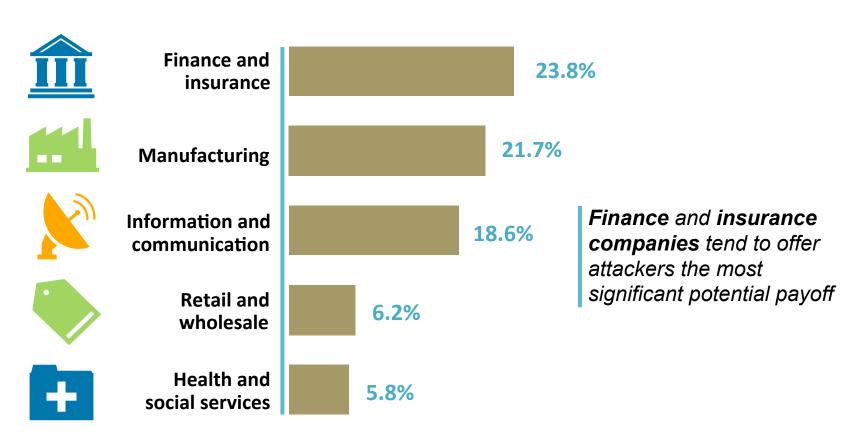
of these attacks will result in an **incident**, **per week**, – a 22% annual increase

2014 IBM Cybersecurity Intelligence Index



Over 75% of incidents were associated with the same five industries

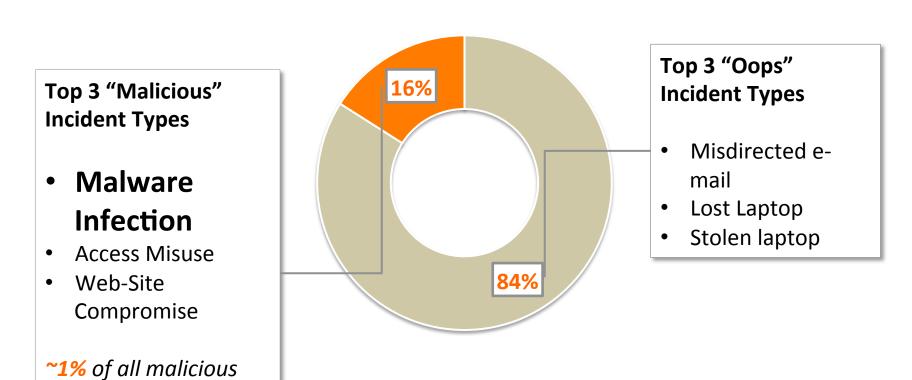
Incident rates across monitored industries



Source: IBM Security Services 2014 CyberSecurity Intelligence Index

From a practitioner's perspective, most security incidents are of the "Oops" variety

Inadvertent Actor ("Oops")
Deliberate Actor (Malicious Intent)

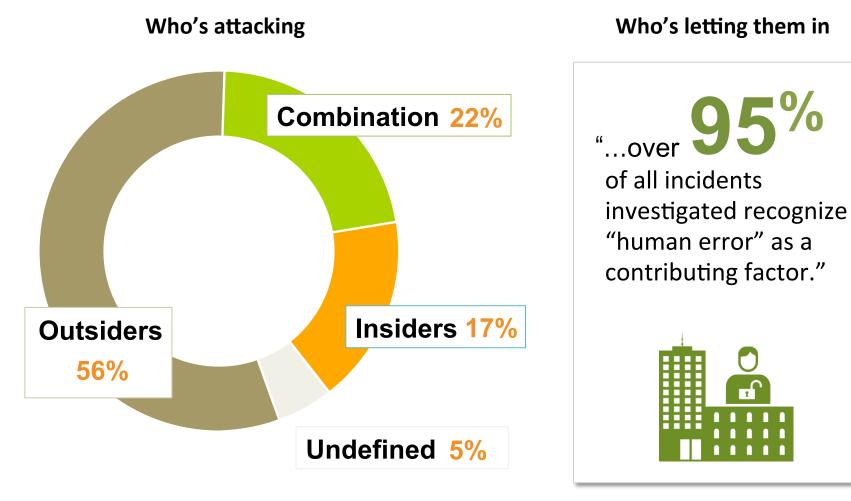


attack result are

"noteworthy" (possibly

material/significant)

While threat actors are acting "maliciously", insiders are an "unwitting" accomplice in 95% of incidents



Top 5 reasons WHY compromise was possible

End users

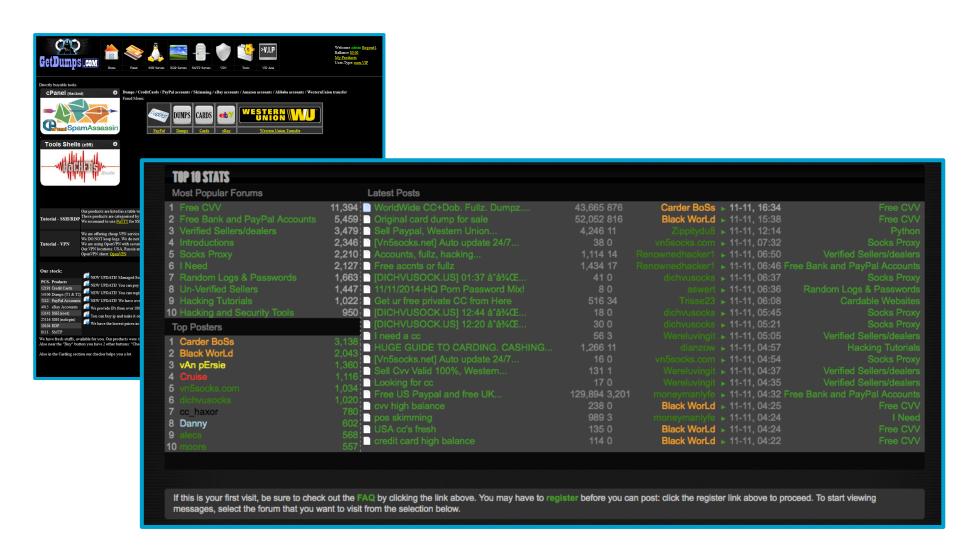
- Double-clicking "on anything", plugging "anything" (like a USB) in
- 2. Disabling security settings and/or anti-virus when it gets in the way
- 3. Using vulnerable, legacy software and hardware
- 4. Failing to install security patches ("Remind me Tomorrow")
- Using a weak or default passwords, or using business passwords for personal use

Systems Admins/Developers

- 1. Connecting systems and virtual images to the Internet before hardening them
- 2. Failing to remove default accounts or passwords, failing to remove old/ unused user accounts
- 3. Failing to update or patch systems/ applications on a timely basis.
- 4. Using legacy or end-of-life software and hardware
- 5. Using insecure remote management software

Why is it crime so easy? IT'S BIG BUSINESS.

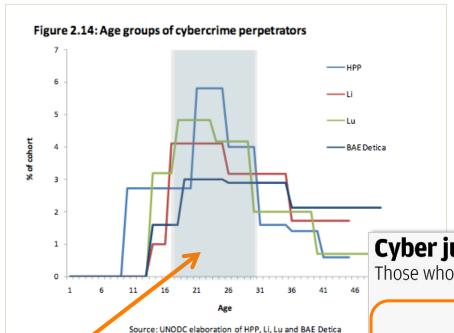
Data is bought an sold in "carding forums"



Attacks-as-service pricing models

Cost	Service Description
\$350-\$400 an hour	Hacker consulting services
\$100 per 1K installs	Malware infection/spreading services
\$535 for 5 hours a day for one week	Distributed Denial of Service (DDoS) attack, money back guarantee
\$40 / 20K emails	Email spam
\$2/30 posts	Blog spam
\$80 for 20K spammed backlinks	Blackhat Search Engine Optimization (SEO)
\$500 to \$10K	Crimeware, with premium support levels available
\$150 and \$400	crack e-mail passwords in less than 48 hours

What keeps me up at night....



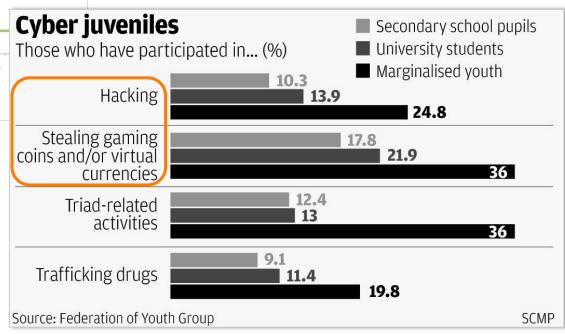
■ By 2011, ~33% of the world's population had access to the Internet.

 By 2017, that percentage will increase to +70%

 45% of all Internet users are currently below the age of 25 years.

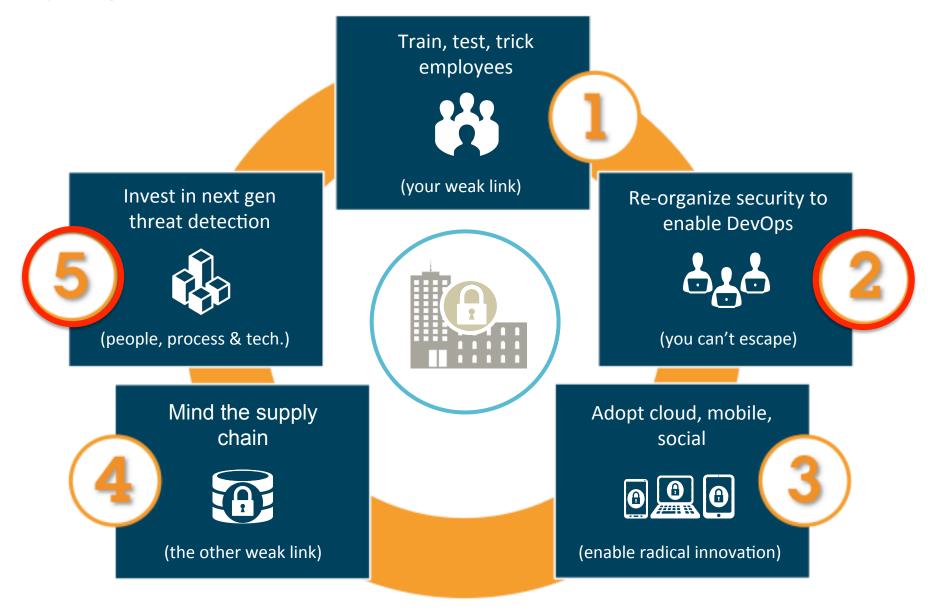
"In the developing country context in particular, sub-cultures of young men engaged in computer-related financial fraud have emerged, many of whom begin involvement in cybercrime in their late teenage years..."

Source: UNODC 2013



Recommendations

My big five focus areas



Restructure to support the Agile/DevOps transformation



STRATEGIC PLANNING SERVICES

Define security strategy & objectives. Analyze metrics and measure effectiveness of controls. Drive continuous improvement.

POLICY & ARCHITECTURE SERVICES

Define the essential security policies, standards and architectures (based on 80/20 rule) which are easy to digest and consume.

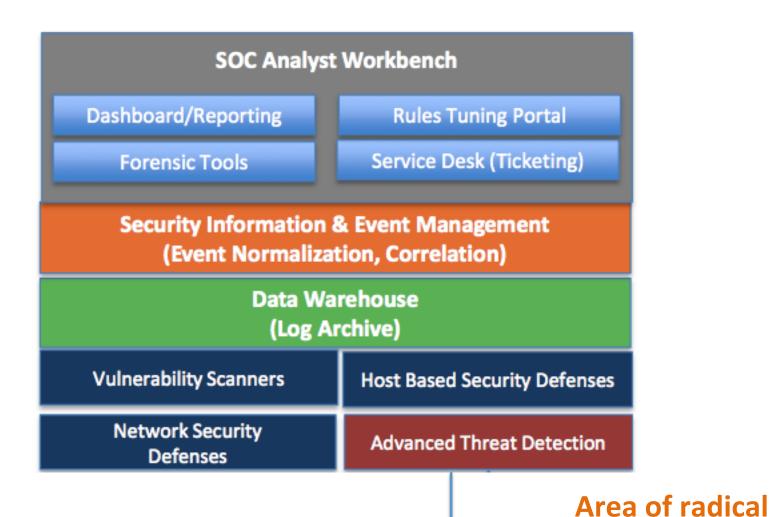
COACHING & ADVISORY SERVICES

Staff domains with security subject matter expertise required to innovate with confidence. Increase security awareness through educational programs for employees and contractors.

SECURITY OPERATIONS

Provide core security monitoring, assessment & response services: Hunter Services, Threat Monitoring Services, and Incident Response

The emerging SOC (detection & response model)



innovation!

Technology Platform

Advanced threat detection via Machine Learning

- Machine learning is a process used to train computers to distinguish between classes of objects, and then to predict the class of an object they have never seen before using classifiers.
- Successfully applied in facial recognition, voice recognition, image processing, and medical diagnostics, it is being applied to cyber threat detection by enabling software classifiers to distinguish malware from benign software.
- Machine Learning has distinct advantages over traditional signature and sandbox-based approaches:
 - Scales to very high volumes of traffic,
 - Resilient to evolving malware and tactics,
 - Higher threat detection rates
 - Limited risk of privacy violation

Summary

- Privacy and security can co-exist, albeit uncomfortably.
- As broader cybersecurity regulation in EU and US is introduced, and impact of the Safe Harbor ruling is fully realized, the pendulum will swing from crisis driven security spending to compliance spending.
- Capabilities like Machine Learning will address trickier issues associated with security monitoring and analysis.
- Investments in DevOps (building security inside) is the only way to systemically "fix" our issues.

Thank you.

There are two reasons why organizations spend money on security

Crisis

(a CXO and/or Board Member read a scary news report)

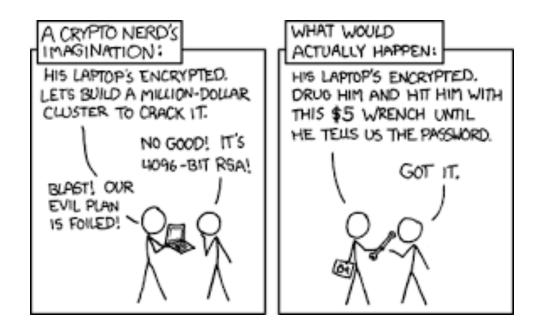


Compliance

(where I think the pendulum is swinging)

The Pragmatic Approach to Security Risk Management

- As a "theory" started gaining momentum in the late 1990s.
- Focuses on finding a balance between effective security and cost
- Belied by a fairly simple "Risk Equation"
- Most regulations/security best practice guides recognize this.



The Axiom... Never spend \$100 dollars on a fence to protect a \$10 horse

Thinking like a security expert

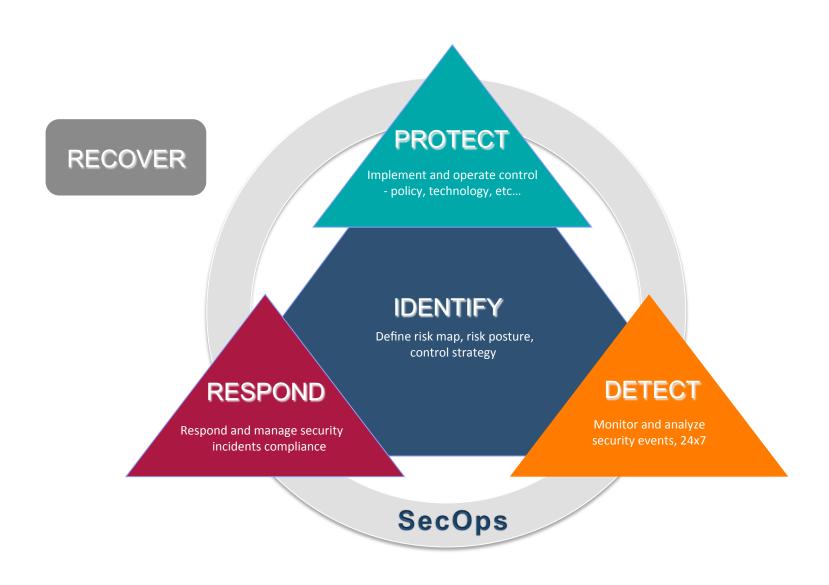
Security risk exists when ...



Security Risk Management is the application of **control**...

- to detect and block the threat,
- to detect and fix a vulnerability,
- or to address the impact when all else fails.

How pragmatic security risk management works



BEWARE: Security Risk Management in REAL LIFE

	—	+	+	+	+	
Phase	People	Data	Apps	Endpoint	Server	Network
1. Identify	Policies, Education & Awareness, Role Managment	Policies, Data Classification (Manual)	Asset Management (CMDB)	Mobile Device Management/ Asset Management	Asset Management CMDB)	Asset Management CMDB)
2. Protect	Identity & Access Mgmt, Biometrics	Encryption, Digital Rights Mgmt	Web App FW, Web & Email Filtering, Access Control, Maintenance	AV, ADS, PFW, IPS, Configuration Mgmt. and Enforcement (MDM on Mobile), Maintenance	AV, IPS, Configuration Mgmt. and Enforcement, Access Control, Maintenance	FW, IDS/IPS Configuration Mgmt. and Enforcement, Access Control, Maintenance
3. Detect	Privileged use monitoring	DB Monitoring, Data Loss Prevention	Security Info & Event Mgmt,; AM & Fraud Detection	AV, Malware Gateway	Security Info & Event Mgmt,	IDS, Security Info & Event Mgmt, Malware Gateway
4. Respond	Varies	Data Privacy Team	Fraud/AML Team	Emergency Response Team	Emergency Response Team	Emergency Response Team
5 Recover						

Cyber Crime impact to the individual?

12.7 Million Consumers suffered identity fraud*
\$16 Billion Total losses due to fraud*

Identity Crimes	\$16 Billion Total losses due to fraud*			
Lost/Stolen PII	Identity Fraud (Existing Account Fraud)	Identity Theft (New Account Fraud)		
13% Breach victims became a victim of fraud in 2014* 85,611,528 Records exposed through breaches**	4.64% Incidence Rate*\$14 Billion Annual Losses*7 Mean Resolution Hours*	.29% Incidence Rate* \$2 Billion Annual Losses* 25 Mean Resolution Hours*		

^{*}Javelin

Source: Javelin Identity Theft Statistics, 2015

Consumers don't always express concerns in practical terms

